

February 6, 2009

**Via ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Suite TW-A325  
Washington, DC 20554

**Re: Minnesota Independent Equal Access Corporation  
(Form 499 Filer ID 803187)**

**2008 CPNI Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Minnesota Independent Equal Access Corporation, and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's 2008 CPNI Certification.

Respectfully submitted,



Brett P. Ferenczak

Counsel for Minnesota Independent Equal Access Corporation

Enclosure

cc: Enforcement Bureau Telecommunications Consumers Division (2 copies)  
Best Copy and Printing, Inc. (via e-mail)

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**Annual 47 C.F.R § 64.2009 (e) CPNI Certification**  
**EB DOCKET NO. 06-36**

**Annual 64.2009(e) CPNI Certification for calendar year 2008**

**Date Filed: January 30, 2009**

**Name of company covered by this certificate: Minnesota Independent Equal Access Corporation**

**Form 499 Filer ID: 803187**

**Name of signatory: Scott Beer**

**Title of signatory: General Counsel and Secretary**

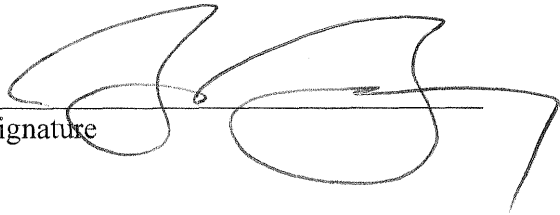
I, Scott Beer, certify that I am an Officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's operating procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rule.

The Company has not taken any actions (proceedings instituted or petitions filed by a Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signature



## **MINNESOTA INDEPENDENT EQUAL ACCESS CORPORATION**

### **STATEMENT EXPLAINING HOW THE COMPANY'S OPERATING PROCEDURES ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES**

The Company has designated a CPNI Compliance Officer who is responsible for: (1) communicating with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of Company employees and agents who use or have access to CPNI; (3) supervising the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintaining records regarding the use of CPNI in marketing campaigns; and (5) receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the Company's CPNI, employees and agents must receive training. Violation by Company employees or agents of such CPNI requirements will lead to disciplinary action.

The Company discloses or releases call detail information to customers during customer-initiated telephone contacts only when the customer provides a pre-established password. If the customer does not provide a password, call detail information is released only by sending it to the customer's address of record or by the carrier calling the customer at the telephone number of record. The Company provides customers with access to CPNI at its retail locations if the customer presents a valid photo ID and the valid photo ID matches the name on the account.

The Company permits customers to establish online accounts, but requires that an appropriate password be furnished by the customer before he or she can access any CPNI in his or her online account. Passwords may not be based upon readily obtainable biographical information or account information.

The Company has adopted a policy that it does not and will not use, disclose or permit access to CPNI in connection with Company-initiated marketing of services to which a customer does not already subscribe from the Company.